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# ROCKY FLATS PLANT COMMUNITY RELATIONS PLAN

**Environmental Restoration Program** 

U.S. Department of Energy Rocky Flats Plant Golden, Colorado

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# ROCKY FLATS PLANT COMMUNITY RELATIONS PLAN

Rocky Flats Plant, Golden, Colorado

#### A. Overview

The Rocky Flats Plant Community Relations Plan describes the mechanisms through which the Rocky Flats Plant near Golden, Colorado, will inform and involve the public in environmental restoration and related environmental activities at the facility. Community interest in the plant has increased over the years since operations began in 1952. Current interest in plant activities is high, particularly concerning environmental and health issues, and public comments indicate that interest will likely remain high throughout the duration of the plant's cleanup effort.

Development of the plan is driven by the community relations provisions of two federal laws concerning hazardous materials management and cleanup, the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments Act (HSWA), and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

The plan also complies with the applicable requirements of the Colorado Hazardous Waste Act (CHWA), which authorizes the state to enforce the RCRA program. Lastly, activities under the plan are intended to meet requirements of the National Environmental Policy Act. The plan, which is modeled after the U.S. Environmental Protection Agency's draft guidance document, Community Relations in Superfund: A Handbook, should be viewed as a baseline document that will be modified as necessary to reflect changes in requirements, opportunities and community interests.

RCRA, as amended by HSWA, regulates hazardous waste storage, disposal and cleanup. CERCLA, as amended by SARA, regulates the cleanup of sites contaminated with hazardous substances and establishes a National Priority List that identifies sites requiring investigation and remedial action. Additional community relations requirements and a schedule for the plan's development and implementation are provided by the Federal Facility Agreement and Consent Order, an Interagency Agreement (IAG) among the U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health.

Some sites identified for cleanup at the Rocky Flats Plant fall under the jurisdiction of either RCRA or CERCLA; others will be subject to both requirements. RCRA regulations apply to currently operating hazardous waste treatment, storage and disposal facilities, and the RCRA corrective action provisions are implemented to remediate releases of hazardous materials from these facilities. CERCLA regulations apply when hazardous materials have been released from abandoned or uncontrolled hazardous waste sites. CERCLA regulations also apply to releases from operating facilities that may pose a threat to human health and/or the environment.

Environmental restoration under the two statutes involves several stages of investigation, assessment and action. The first stage is a preliminary characterization to identify potentially hazardous sites that need further investigation. RCRA refers to this activity as the RCRA Facility Assessment. The similar CERCLA effort is a Preliminary Assessment/Site Inspection.

The second stage fully characterizes the nature, extent and rate of contaminant releases identified in the initial characterization. The RCRA term for the full characterization is RCRA Facility Investigation, while the companion CERCLA process is Remedial Investigation.

The third stage of environmental restoration is the evaluation and selection of remediation alternatives. The RCRA activity is termed the Corrective Measures Study, which may develop only one alternative. The similar CERCLA activity, the Feasibility Study, must consider several remedial action alternatives. Environmental restoration at the Rocky Flats Plant will follow the CERCLA criteria, considering several alternatives, as set forth in the IAG.

The fourth stage results in the production of a Proposed Plan that outlines the lead agency's preferred cleanup alternative and also summarizes all other alternatives considered. A public comment period of 60 days on the Proposed Plan provides citizens with an opportunity to have input in the agency's remedy selection process. The RCRA counterpart of this phase is draft permit modification, which also involves public review and comment.

The fifth stage authorizes and supports the selection of a remedy. The RCRA Corrective Action Decision and the CERCLA Record of Decision comprise information used in determining the final remedy. If an amendment to the Corrective Action Decision or Record of Decision is proposed, another opportunity for public comment is provided.

The final stage involves the design and implementation of the selected remedy. RCRA refers to this activity as the Corrective Measures Implementation or Corrective Design. The similar CERCLA effort is Remedial Design/Remedial Action.

An additional intermediate stage, indirectly addressed in the National Oil and Hazardous Substances Pollution Contingency Plan, will be implemented at the Rocky Flats Plant. An Interim Measures/Interim Remedial Action stage will evaluate alternatives and select actions to serve as interim measures in the remediation of certain areas of the plant. Like final Proposed Plans, proposed Interim Measures/Interim Remedial Action plans are reviewed and commented on by the public during a 60-day comment period.

Although RCRA, CERCLA, CHWA and the IAG provide the basis for the *Rocky Flats Plant Community Relations Plan*, the plan is tailored to the needs of the community. Members of the public in the Denver metropolitan area contributed substantially to the development of the plan through an extensive community interview program.

Interviews with government officials, area business leaders, educational representatives, health professionals, interest groups, news media and local residents identified public concerns and expectations regarding cleanup of the plant. In addition, the interview participants

suggested community relations activities that would help the public become better informed about environmental cleanup at the plant and ensure early citizen involvement in the decision making process.

Public participation was also sought in defining the community in which the U.S. Department of Energy will concentrate its community relations efforts. The consensus among interview participants was that the community should be defined as metropolitan Denver, comprising Denver, Adams, Arapahoe, Jefferson, Boulder and Douglas counties. Therefore, the focus of the plan is on these counties and the cities within them, particularly Denver, Boulder, Broomfield, Northglenn, Thornton, Westminster, Arvada and Golden.

The Rocky Flats Plant Community Relations Plan establishes the U.S. Department of Energy's community relations objectives regarding environmental restoration, including environmental monitoring and waste management, at the Rocky Flats Plant and describes the planned mechanisms for meeting those objectives. Community relations initiatives concerning other plant activities, such as materials production and research and development, are outside the scope of this plan. The Rocky Flats Plant, where possible, will use this plan as a model when involving the public in those activities.

The U.S. Department of Energy is ultimately responsible for implementing a community relations program that complies with the applicable laws, regulations, guidance and policies. The U.S. Department of Energy's managing and operating contractor at the plant, EG&G Rocky Flats, Inc., will assist with implementation of the program at the direction of the U.S. Department of Energy. Since all community relations activities will result from a cooperative effort by the two entities, reference is made in this plan to the Rocky Flats Plant rather than to the U.S. Department of Energy specifically.

The remainder of the Rocky Flats Plant Community Relations Plan is organized as follows:

- Site Description
- Community Background
- Objectives
- Community Relations Activities

The first three sections provide the framework for the discussion of community relations activities, which are divided into two parts. The first part addresses the community relations activities required by federal law and established in the IAG. The second part sets forth additional community information and involvement initiatives that will be implemented in response to public comments on the IAG and as suggested during community interviews.

More information about the *Rocky Flats Plant Community Relations Plan* and the topics it addresses can be obtained from the Community Relations Plan Information Coordinator:

Community Relations Plan Information Coordinator Community Relations Division EG&G Rocky Flats, Inc. P.O. Box 464, T130F Golden, Colorado 80402-0464 (303) 966-6160

Additional information contacts for the U.S. Department of Energy, EG&G Rocky Flats, Inc., the U.S. Environmental Protection Agency, the Colorado Department of Health, Congressional offices, state and local governments, environmental and citizen groups, medical and public health interests, businesses, educational interests, news media, and local citizens are listed in Appendix A.

## **B. Site Description**

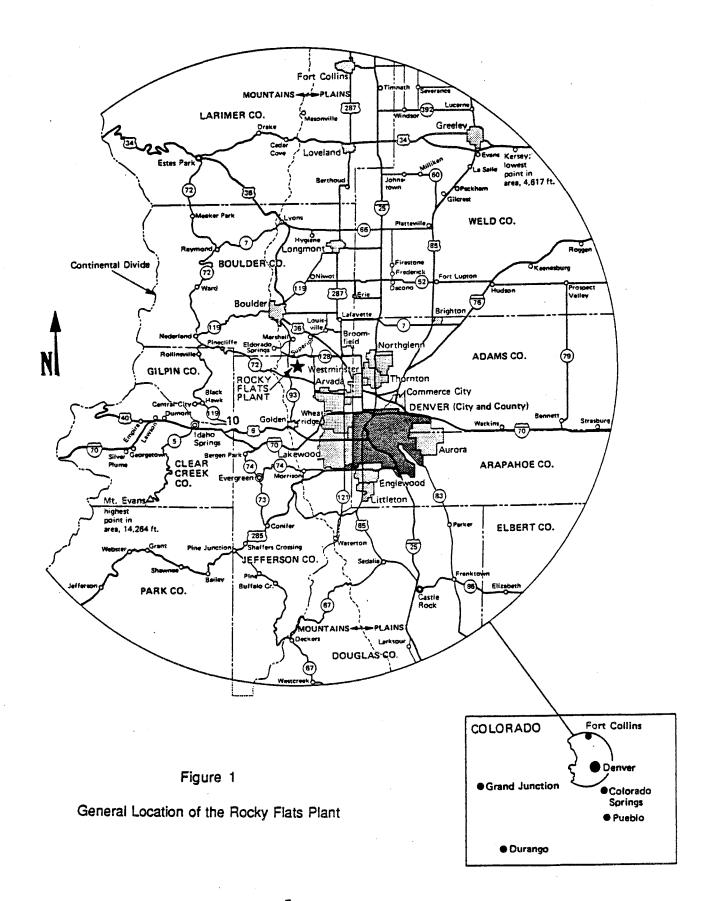
The Rocky Flats Plant is located in northern Jefferson County, Colorado, approximately 16 miles northwest of downtown Denver and seven to 10 miles from the communities of Boulder, Broomfield, Westminster, Arvada and Golden (Figure 1). The 384-acre plantsite is located within a restricted preserve of approximately 6550 acres, which serves as a buffer zone between the plant and the surrounding communities. Current employment at the plant is approximately 6200.

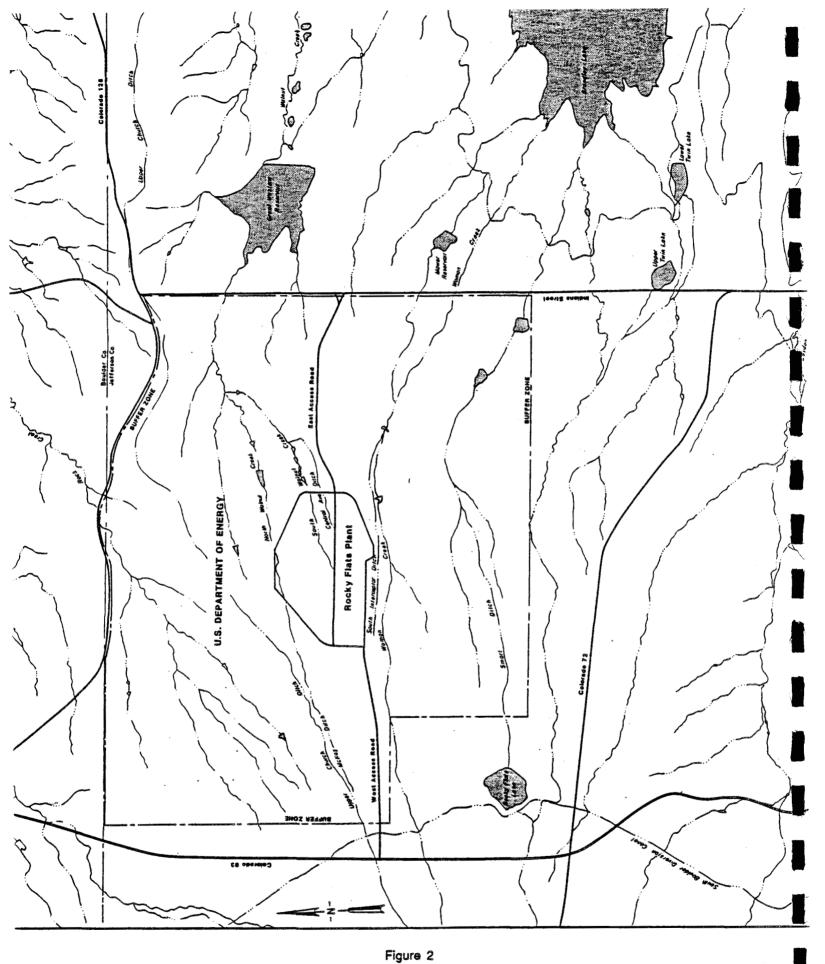
The plant, located on the eastern edge of a geological bench known locally as Rocky Flats, is at an elevation of about 6000 feet. The rocky bench is about five miles wide in an east-west direction and flanks the eastern edge of the Front Range of the Rocky Mountains. The Continental Divide is approximately 26 miles west of the plant.

The Rocky Flats Plant is directly upstream of two reservoirs used for municipal water supply, Great Western Reservoir and Standley Lake. Walnut Creek and Woman Creek are the two intermittent creeks that naturally drain the area from the plantsite into Great Western Reservoir and Standley Lake, respectively (Figure 2). Walnut Creek drainage currently is diverted around Great Western Reservoir and discharged back into the creek east of the reservoir. Additionally, Woman Creek drainage currently is intercepted by a dam on the plantsite and directed by pipeline into Walnut Creek upstream of the diversion around Great Western Reservoir.

#### Plant History

The Rocky Flats Plant is a key facility in the federal government's nationwide nuclear weapons research, development and production complex. It supports the nuclear weapons program and other work related to national defense with unique processing capabilities for the fabrication of





Surface Water Drainage Patterns at the Rocky Flats Plant

weapons components from plutonium, uranium, beryllium and stainless steel. The plant also plays a key role in the decommissioning and maintenance of nuclear weapons and would be instrumental in the implementation of any future arms reduction agreements.

The plutonium operations involve the use of high-precision equipment and techniques for metallurgical casting, rolling and forming operations; machining, joining and nondestructive testing; and chemical operations necessary for recovery of plutonium for reuse or storage.

Construction of the Rocky Flats Plant began in 1951, and initial operations occurred the following year. The plant was operated at that time by Dow Chemical U.S.A., a unit of the Dow Chemical Company, for the U.S. Atomic Energy Commission. When the Energy Reorganization Act of 1974 dissolved the U.S. Atomic Energy Commission, federal government responsibility for the plant was assigned to the Energy Research and Development Administration.

On July 1, 1975, Rockwell International assumed operation of the plant for the Energy Research and Development Administration. Two years later, the Energy Research and Development Administration was changed to the U.S. Department of Energy, the current federal agency responsible for the plant. EG&G Rocky Flats, Inc. took over the operating contract on January 1, 1990.

Materials have been used, produced and managed at the plant since operations began in 1952 that would later be defined as hazardous substances, pollutants and contaminants by CERCLA and as hazardous waste and hazardous constituents by RCRA. Some of these materials have been detected in air, water or soil at and near the site.

Throughout the plant's history, plant operations have incorporated safety controls to protect workers, the public and the environment. Nevertheless, some incidents occurred that resulted in onsite and offsite radioactive or hazardous materials contamination. Also, like many industries, the plant historically used accepted methods of disposal, such as shallow-land burial of certain materials, that would not meet today's standards. These areas are currently being remediated or are scheduled for remediation.

The first significant event of public interest was an explosion and fire that occurred on September 11, 1957, in one of the plutonium processing buildings, Building 771. The explosion of flammable vapors in the building may have contributed to a release of plutonium from the building. The total estimated release of plutonium from the fire was 25,618 microcuries.

A second significant fire took place on May 11, 1969, in Buildings 776 and 777, also used for plutonium processing. Although the buildings suffered extensive damage, the filter systems remained operational, preventing a release such as occurred during the 1957 fire. After analyzing offsite vegetation samples following the fire, scientists concluded that the estimated release from the fire was 856 microcuries of plutonium and was confined to the plantsite. Additionally, much of the release was attributed to contamination of the firefighters' shoes rather than to airborne emissions. Both fires brought about significant safety improvements in the plant's plutonium operations.

Environmental investigations of the sediments in Standley Lake and Great Western Reservoir were conducted by the U.S. Environmental Protection Agency in the 1970s and the Rocky Flats Plant in the 1980s. The investigations identified some residual plutonium deposited from the plant either through fugitive dust or waterborne releases that occurred primarily from the 1950s into the 1970s. Pollution control measures were later implemented to mitigate such sources of contamination.

Sediment studies conducted within the last 10 years have demonstrated that the contaminated sediment in the lakes is now buried by noncontaminated sediment and that the water quality has not been measurably affected. Tap water originating from these lakes is analyzed routinely for plutonium. Although the offsite reservoir waters consistently meet the state's drinking water standards, the lakes and the surrounding land will be investigated further as part of the plant's environmental restoration effort.

An area in the southeast corner of the plantsite, now known as the 903 Pad Area, was a source of fugitive plutonium dust in the 1950s and 1960s. Waste drums, which were stored at these areas beginning in 1958, corroded over time, leaking hazardous and radioactive materials into the surrounding soil. After the drums were removed in 1967, winds resuspended and redeposited the contamination, which was controlled when the area was partially remediated through soil removal and subsequently covered with gravel and asphalt in 1969. Cleanup of the 903 Pad and surrounding areas is a high priority within the entire environmental restoration program.

In May 1973, a tritium release was discovered by the Colorado Department of Health in a water sample taken from Walnut Creek, which flows into Great Western Reservoir. The release occurred in waste water as a result of the unanticipated presence of tritium in scrap metal shipped to the plant for recovery and reprocessing. The Rocky Flats Plant does not generally use tritium in any of its operations.

The U.S. Environmental Protection Agency reported that approximately 60 curies of tritium reached the Great Western Reservoir and that the public health impacts were considered minimal. After the tritium incident, the plant improved its methods for detecting tritium and developed flood control ponds and an interceptor ditch to divert runoff water around the plantsite. Because tritium is a short-lived radioactive element, all tritium deposited in Great Western Reservoir has since decayed to levels found naturally in the environment.

### Superfund Designation and Environmental Restoration

As the nation became more environmentally aware in the 1970s and 1980s, the U.S. Department of Energy undertook several initiatives to improve safety and environmental management at its nuclear facilities. Among these was the establishment of the Comprehensive Environmental Assessment and Response Program in 1984. The program was designed to fulfill the U.S. Department of Energy's commitment to environmental compliance with new state and federal requirements and to set environmental management priorities at U.S. Department of Energy sites.

In April 1986, the U.S. Department of Energy completed the *Comprehensive Environmental Assessment and Response Program, Phase I: Installation Assessment* for the Rocky Flats Plant, which investigated 80 potential environmental problems and identified areas, both onsite and offsite, that qualified for inclusion on the National Priority List established by CERCLA. These areas included burial trenches, old landfills, out-of-service waste tanks and process lines, surface deposits and fuel or solvent spills.

In July 1986, the U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health entered into a Compliance Agreement that defined roles and established milestones for environmental operations and remedial investigations at the Rocky Flats Plant. In accordance with the 1986 Compliance Agreement, the U.S. Department of Energy identified 178 individual hazardous substance sites, which are distinct land areas where hazardous substances are or may be present. The plant was placed on the National Priority List in September 1989.

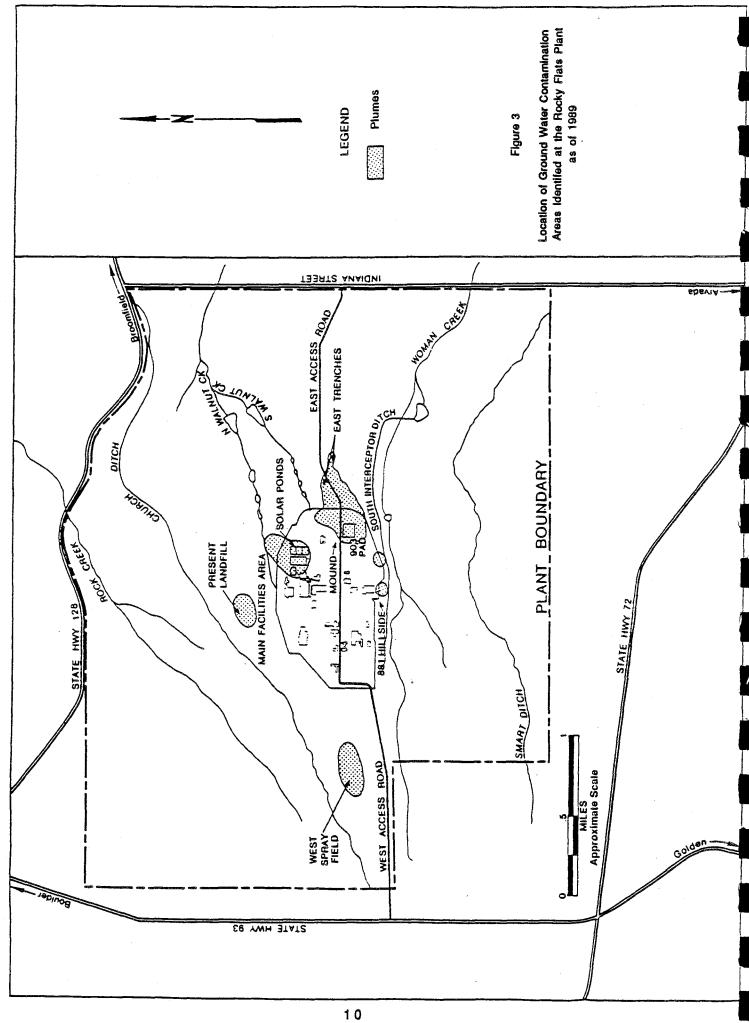
The Interagency Agreement, which replaces the 1986 Compliance Agreement, reflects new requirements of the Superfund Amendments and Reauthorization Act and further clarifies cleanup priorities. The U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health signed the IAG on January 22, 1991.

An attachment to the IAG lists hazardous substances used at the plant that have been released or that could be released to the environment. The identified substances include radionuclides, metals, inorganic compounds, volatile organic compounds, semi-volatile organic compounds and miscellaneous materials.

The containment of these substances is of concern to the plant, federal and state regulators and the public because of their potential harmful effects to humans and to flora and fauna in the area. The potential effects of the substances may include cancer, biological mutations and/or fetal malformations. The IAG list of hazardous substances is included in this document as Appendix B.

Plutonium, the primary radionuclide of concern at the plant, has been detected in elevated concentrations east of the plant and onsite as described above. Plutonium particles can barely penetrate the skin's surface and can be completely stopped by a sheet of paper. However, the particles can be extremely toxic if inhaled, allowing the internal tissues to be exposed and damaged. Hence, plutonium-contaminated areas are among those that will undergo remediation. Additionally, current plutonium operations are carefully controlled to ensure worker and public safety and protection of the environment.

Ground water contamination has been detected onsite in the areas known as the 881 Hillside; the 903 Pad, Mound and East Trenches Areas; the Solar Ponds; the present landfill and the West Spray Field (Figure 3). Common industrial volatile organic compounds, including the solvents trichloroethylene, tetrachloroethylene, carbon tetrachloride and trichloroethane, and their biological degradation products account for most of the contamination. These volatile organic compounds are suspected or known to have cancer-causing effects in laboratory animals at parts per billion levels.



The plant discontinued use of trichloroethylene and tetrachloroethylene in the mid-1970s. Carbon tetrachloride and trichloroethane are the currently used solvents. More detailed information about these contaminants can be found in the *Comprehensive Environmental Assessment and Response Program, Phase I: Installation Assessment* mentioned previously.

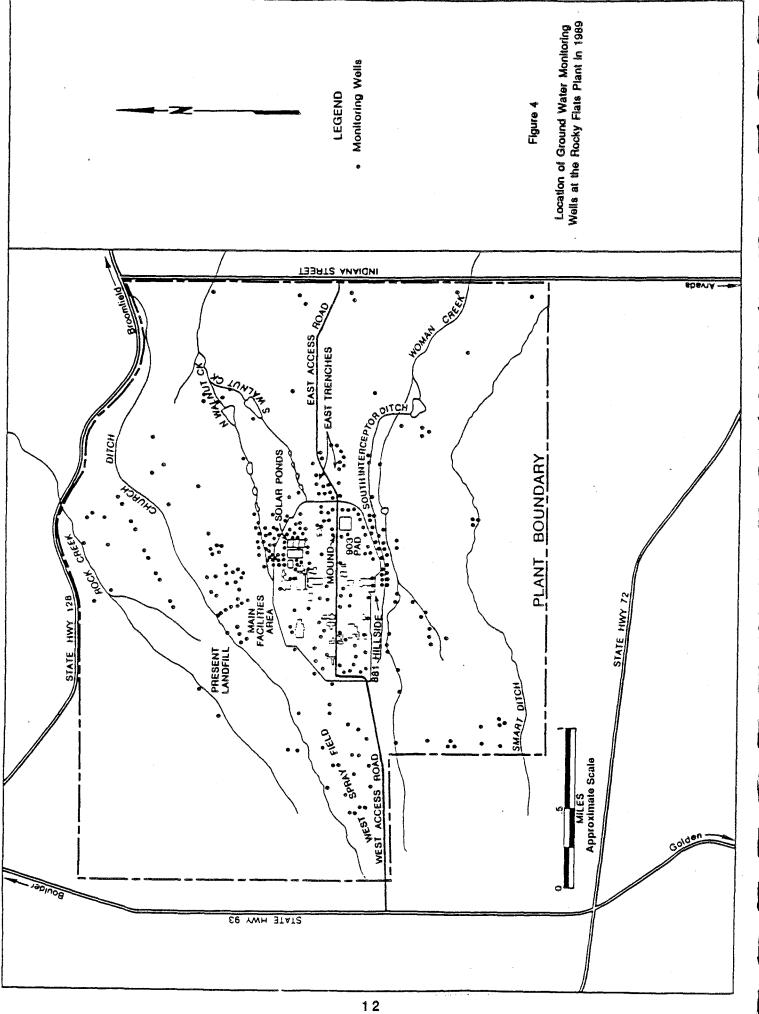
Extensive environmental monitoring of the site presently seems to indicate that the ground water contamination has not migrated beyond the plant's boundaries. The ground water monitoring program has continued to be an important part of the overall plant monitoring effort since 1960. The Rocky Flats Plant had installed 193 monitoring wells through 1987, and another 153 wells were added onsite in 1989 (Figure 4). Data from the plant's 346 wells are analyzed to monitor ground water quality and to understand the chemistry and movement of water below the surface.

The IAG, which sets forth the activities and schedules for environmental restoration at the plant, organizes the individual hazardous substance sites into 16 larger areas, termed operable units (OUs). The OUs are ranked and assigned schedules according to cleanup priority. The schedule provides for interim remedial action at several of the OUs while investigations continue in support of final remedial action. The 16 operable units are designated as follows:

- OU 1 881 Hillside Areas
- OU 2 903 Pad, Mound and East Trenches Areas
- OU3 Offsite Releases
- OU 4 Solar Ponds
- OU 5 Woman Creek
- OU 6 Walnut Creek
- OU7 Present Landfill
- OU 8 700 Area
- OU 9 Original Process Waste Lines
- OU 10 Other Outside Closures
- OU 11 West Spray Field
- OU 12 400/800 Area
- OU 13 100 Area
- **OU 14 Radioactive Sites**
- OU 15 Inside Building Closures
- OU 16 Low-Priority Sites

The IAG provides milestones for the activities and documentation requirements for CERCLA and RCRA remediation of the 16 operable units. The milestone schedules currently extend into August 2001.

Another agreement was executed by the U.S. Department of Energy and the state of Colorado in June 1989. The Agreement in Principle provides for the transfer of technical and financial support from the U.S. Department of Energy to the state for environmental oversight, monitoring, remediation, emergency response and health-related activities. The agreement also provides for the accelerated cleanup of areas of the plant where contamination may pose an imminent health or environmental danger.



# C. Community Background

#### Community Profile

Located 16 miles northwest of downtown Denver, Colorado, the Rocky Flats Plant is on the fringe of a highly populated metropolitan area. The 1990 estimated population within a 50-mile radius of the plant was approximately 1.9 million. The communities closest to the plant, Broomfield, Westminster and Arvada, have grown substantially since it was built in 1951, greatly increasing the population within a 10- to 20-mile radius of the plant.

Residential development within a five-mile radius of the plant is minimal according to a 1989 population study conducted by the Denver Regional Council of Governments. The study, which covered Denver, Adams, Arapahoe, Jefferson, Boulder and Douglas counties, found that the population within three miles of the plant is approximately 50. Within this area are ranches that produce crops, raise cattle and breed and train horses. Close to 9000 people live within five miles of the plant, primarily north and southwest of Standley Lake.

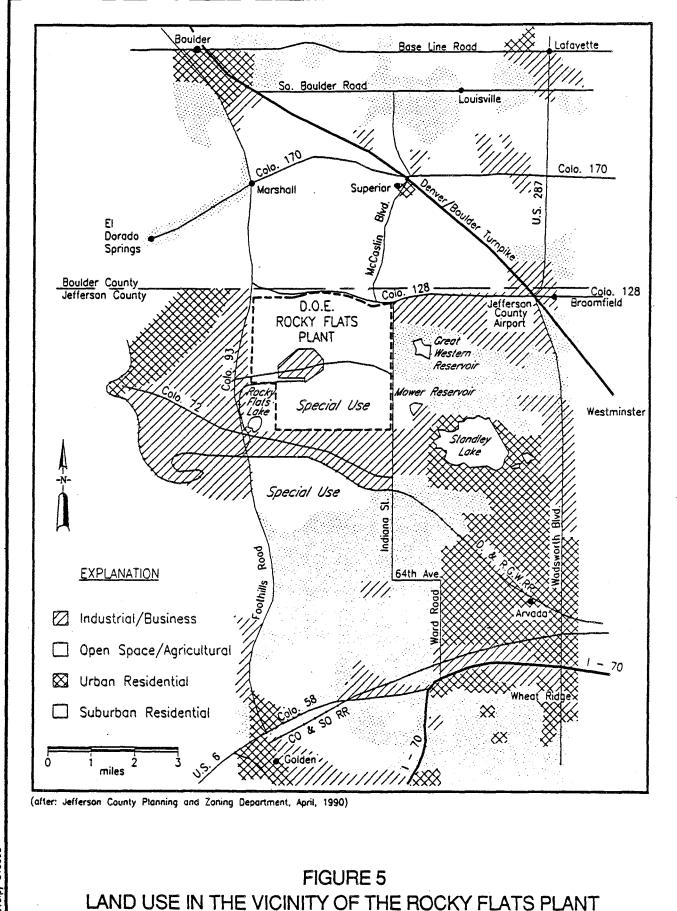
Commercial development within five miles of the plant is also limited, with the exception of the Jefferson County Airport located nearly five miles to the northeast (Figure 5). A small area to the northwest of the plant along Highway 93 is used for gravel operations. The largest concentration of industrial use land within 10 miles of the plant includes Coors Brewery and some gravel operations. This land is located eight miles south of the plant near Golden.

The area immediately surrounding the plant is primarily undeveloped rangeland. Much of the land within a 10-mile radius is also used for grazing cattle, raising horses and growing crops such as wheat, barley and hay.

The W-470 Authority has proposed the construction of the western section of I-470, a perimeter highway around Denver, near the plant. The proposed highway would pass by either the west boundary or the east boundary of the plant. No decision has been made regarding the future of the highway in this area. However, if the highway is built near the plant, commercial development would likely increase in the area. A large parcel of land south of the plant along Highway 72 is already zoned for industrial use. The proposed highway is the center of much controversy because of its potential proximity to the plant and its impact on land that is currently preserved as open space.

Ninety-three public schools are located within 10 miles of the Rocky Flats Plant, half of which are to the southeast. The school closest to the plant, Witt Elementary School on W. 104th Drive in Westminster, is approximately five miles away. This area also includes four major hospitals, which are located in Louisville, Westminster and Boulder.

The closest recreational area is Standley Lake, which is approximately five miles from the plant. The lake is used primarily for boating and picnicking. Other small parks are found in the communities within a 10-mile radius of the plant.



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In 1988, the Rocky Flats Plant was the fifth largest manufacturing employer in the Denver metropolitan area, with Rockwell International employing almost 5400 people. With a total payroll of more than \$227.16 million, the plant contributed significantly to the local economy. In 1989, the plant's economic impacts on the Denver area and the state of Colorado totalled \$823.38 million and \$980.23 million, respectively.

As a whole, the citizens in the communities surrounding the Rocky Flats Plant are generally knowledgeable about the plant, its mission and the associated environmental issues. This level of knowledge is attributed primarily to the plant's proximity to a large population center and the significant amount of local news media attention given to plant issues and events, both historically and currently. During the community interview process, most participants cited the news media as their primary source of information about the plant in the past.

The Rocky Flats Plant recognizes that, in the past, the community lacked information from the plant directly, resulting in public distrust and frustration about not having a role in shaping policy concerning plant activities. This sentiment was expressed by nearly all of the community interview participants, who asked for improved public access to information and involvement with the plant and its regulators in the environmental restoration process.

Clearly, more information needs to be made available by the plant to facilitate effective public participation in decisions about plant activities, and the information should be understandable to both technical and nontechnical audiences. Additionally, the Rocky Flats Plant needs to focus on ways to encourage citizen input and dialogue between plant officials and the public regarding environmental issues.

#### Chronology of Community Involvement

Because of the proximity of the Rocky Flats Plant to a major metropolitan area, growing public interest over the years has focused on operations and activities that could affect public health and the environment. The 1957 and 1969 fires concerned the surrounding communities, as did the detection of tritium in Great Western Reservoir in 1973. The discovery of elevated levels of plutonium in the sediments of Great Western Reservoir and Standley Lake early in the 1970s caused further public fear and interest in plant activities.

During the early years of operation, however, the public was uninformed about the plant and the work that took place there. Some community interview participants who lived in the area when the plant was built reflected on the feelings of anticipation and pride that followed the U.S. Atomic Energy Commission's selection of Rocky Flats as the location for its new facility. They also reflected on an ensuing "shroud of secrecy" regarding plant operations that was accepted by the community as necessary for the protection of national security.

As the 1970s approached, anti-war and anti-nuclear groups began to form and to question publicly the need for and practices of the nation's nuclear weapons facilities. By the end of the decade, Rocky Flats was the site of many peace and anti-nuclear demonstrations, some of which drew thousands of participants. The largest gathering of protesters at the plant occurred in October 1983 when more than 12,000 demonstrators attempted to encircle the plant.

Rocky Flats was also the site of a pro-nuclear rally held in August 1979 to promote the continued development of nuclear weapons and nuclear power. The rally attracted close to 16,000 supporters.

The demonstrations and their coverage in the media served to raise concerns among citizens in the communities surrounding the plant. The public sought detailed information about plant operations and their potential effects on public health and the environment. Monthly meetings were established by the U.S. Department of Energy and the state in 1972 to share and compare environmental monitoring data.

Also, many health and environmental studies were conducted by the U.S. Department of Energy, the U.S. Environmental Protection Agency, the state, nearby municipalities, universities, national laboratories and state-appointed citizen committees.

Special citizen committees were formed by Colorado officials to consider public concerns and to provide information about the plant to area residents. The first of these groups was created in December 1974 by then-Governor Richard Lamm and Congressman Tim Wirth, hence termed the Lamm-Wirth Rocky Flats Task Force. The task force recommended the formation of an independent citizens' monitoring committee to continually review plant operations. The Rocky Flats Monitoring Committee served this function from 1976 until 1981.

The Lamm-Wirth Rocky Flats Task Force also recommended that the U.S. Department of Energy develop a long-range utilization study of the plant. Lamm and Wirth then appointed a third citizens' panel, the Blue Ribbon Citizens' Committee, in 1981 to oversee the study. The Rocky Flats Monitoring Committee was reconvened in 1986 and served until 1987, when newly elected Governor Roy Romer and Congressman David Skaggs replaced it with the current 11-member Rocky Flats Environmental Monitoring Council.

In 1975, a lawsuit against the U.S. Department of Energy and a former Rocky Flats Plant operating contractor was filed in U.S. District Court by adjacent landowners to the east of the plant boundary. The state of Colorado and Jefferson County were later added to the list of defendants.

The lawsuit alleged that the landowners were prevented from developing their property because of airborne contamination from the 903 Pad area. Although the U.S. District Court judge concluded that the levels of radioactivity were not significant enough to restrict land use, the case was settled out of court in 1985.

Radioactivity levels throughout the landowners' property were within the proposed U.S. Environmental Protection Agency standard of 40 disintegrations per gram per minute. In the settlement agreement, however, the U.S. Department of Energy consented to remediate the land to within the state's construction standard of 2 disintegrations per gram per minute. The settlement agreement also included the transfer of more than 800 acres of land to Jefferson County and the City of Broomfield for future expansion of Great Western Reservoir and for open space and recreational uses.

Much public controversy arose from the testing in 1987 of an incinerator for reducing the volume of liquid and solid low-level radioactive mixed and hazardous waste. Again, the public's concern was the potential for environmental contamination as a result of plant activities, specifically incineration.

In June 1989, a federal raid, involving the U.S. Environmental Protection Agency, the Federal Bureau of Investigation and the U.S. Department of Justice, generated nationwide attention. The purpose of the raid was to look into allegations of mismanagement and negligent and criminal practices. In August 1989, a federal grand jury was convened to determine if any laws had been violated. To date, no indictments have been issued as a result of the investigation. However, the investigation precipitated more questions and concerns in the community about the plant and its operations.

Also in June 1989, the Secretary of Energy dispatched a Special Assignment Team to independently evaluate the plant's operations and practices. The team, known as the Tiger Team, assessed the plant's environmental conditions and recommended corrective actions in August 1989. The Rocky Flats Plant responded to the assessment in July 1990 by issuing a Corrective Action Plan for implementation of the Tiger Team's recommendations.

Through the years, the Rocky Flats Plant responded to public interest in its activities in a variety of ways. The plant began providing its environmental monitoring data to the news media in 1960 and held the first news media tour of the plant in 1963. A speakers bureau was introduced in 1967, offering presentations by plant workers to groups in the Denver area. Public tours of the plant were initiated in 1975 to increase community awareness about plant operations and safety procedures. Also, an onsite Visitor Education Center was completed in 1985.

Currently, the Rocky Flats Plant is responding to the public's high-level of interest with several information and involvement initiatives. Through an established tour program, federal, state and local elected officials, community groups, the media and the public visit the plant on a regular basis. Numerous oversight groups, such as the Defense Nuclear Facilities Safety Board (Conway Board) and the Advisory Committee on Nuclear Facility Safety (Ahearne Committee), also visit the site regularly. In 1990, the plant hosted close to 1000 visitors.

An active speakers bureau offers presentations by plant personnel to groups in the area upon request. During 1990, Rocky Flats Plant speakers were invited to address more than 5100 people in 105 community groups and schools.

The Rocky Flats Plant also places documents in five public information repositories in the Denver area where the public can review historical and current information about the plant. In 1990, more than 300 people used the U.S. Department of Energy Public Reading Room, which is located at the Front Range Community College Library in Westminster, Colorado.

Present holdings at the U.S. Department of Energy Public Reading Room include unclassified technical and environmental reports, plant handbooks and manuals, oversight reports, newsletters and newspaper articles. In 1990, more than 3000 documents were added to the

reading room. The other information repositories are maintained by the U.S. Environmental Protection Agency, the Colorado Department of Health, the Rocky Flats Environmental Monitoring Council and the Boulder Public Library. [NOTE FOR DRAFT CRP: The information repository at the Boulder Public Library is not yet established but will be by the time the CRP is implemented.]

The Rocky Flats Environmental Monitoring Council holds a public meeting each month at Front Range Community College to discuss plant activities. The plant actively participates in these meetings, providing presentations and written materials and answering questions from the council and the public. The plant also participates in regular information meetings with other interested groups, including the area municipalities and local businesses.

In addition to these mechanisms for involving the public in plant activities, the plant conducts public meetings to answer questions, to clarify issues and to receive citizen comments and recommendations. In 1990, the Rocky Flats Plant held eight public meetings and participated in 15 others.

The plant generates fact sheets, brochures and news releases on a routine basis and disseminates them to the news media and the public. Also, the plant responds to written and telephone requests for information from organizations and individuals in Colorado and around the country on a daily basis. These activities and others are described in more detail later in this plan.

#### Key Community Concerns

The Rocky Flats Plant Community Relations Plan is intended to respond to public concerns expressed during the community interview process, at public meetings, in written comments and letters and during informal discussions. The Rocky Flats Plant conducted 67 community interviews with federal, state and local officials; business leaders; educational representatives; health professionals; interest groups; news media; and local residents.

The participants were asked to identify their main concerns about the plant and their expectations regarding its cleanup. They were also asked to identify ways that the plant could more effectively inform them of environmental restoration activities and involve them in the decision making process. The *Community Interview Plan*, including the questions asked during the interviews, is Appendix C. The community concerns are divided into five categories: Health Effects, Environmental Issues, Economic Issues, Public Information and Involvement Needs and Defense Policy Considerations.

Health Effects. Many interview participants expressed concern about the potential health risks to workers and area residents posed by day-to-day plant operations, both past and present, and by offsite contamination. Some citizens feared the long-term effects of low levels of radiation from the plant as well as the cumulative effects of releases. Participants cited the local controversy over the plant's use of a waste incinerator as evidence of public concern about health effects.

One participant said that the federal government was downgrading the safety standards for nuclear materials despite the lack of scientific understanding of radiation and its health effects. Another wondered about the effects the plant would have on the health of future generations born of past or current area residents. Other interview participants thought that the perceived health risks were overstated and were not concerned about effects from day-to-day plant operations.

The potential for a fire, an explosion or a hazardous or radioactive materials transportation accident was listed as a concern by several citizens. Some referred to the fires of 1957 and 1969 as events that could have long-term health effects on the area population and expressed concern that similar incidents could happen in the future. Some interview participants said that the plant was reluctant to release health statistics, which served to heighten public fears.

Environmental Issues. Citizens expressed concern about the potential environmental impacts of the plant within the plant boundaries and in the surrounding communities. Some feared that contaminated ground water from the plantsite will migrate offsite and into public drinking water supplies. Others are concerned that the plant's surface water will become contaminated and will make its way into Great Western Reservoir and Standley Lake, two municipal drinking water supplies.

Another environmental concern voiced by members of the community is that environmental restoration activities will cause the resuspension of plutonium dust in the air, exposing remediation workers and the public to its toxic effects. A few citizens wondered about the effects of plant operations and contamination on wildlife and livestock on and near the facility.

Several interview participants stated emphatically that environmental restoration should take priority over production at the plant. However, other citizens expressed concern that, if production activities were permanently halted, the plant would discontinue cleanup efforts and leave the site in its current condition.

In considering the environmental restoration effort specifically, citizens disagreed on the level of remediation that should or could be accomplished with the available technologies. Some community members wanted the site to be restored to its original state, while others suggested that cleanup should strike a balance among technical, political and financial considerations. Others wondered who would make the determination during remediation that the site is clean enough and how the determination would be made.

Most interview participants agreed that the site should be cleaned up, although some wondered if the technologies available are adequate. Others questioned whether the high cost of cleanup was justifiable, suggesting that the site be stabilized and declared a "national sacrifice zone."

**Economic Issues.** A wide range of economic issues were raised during the interviews, including adequacy of funding for cleanup, the negative economic effects to the community if the plant is not cleaned up and the negative economic effects of plant closure.

Several citizens expressed concern that, despite the U.S. Department of Energy's commitment to environmental restoration of the site, future funding necessary to complete the effort will be scarce and inadequate. The lack of adequate funding for effective state and federal regulatory oversight was also cited as a concern.

Some community members, particularly within a few miles of the plant, feared the negative economic effects of a decision not to remediate the site. A few nearby citizens stated that property values have already decreased because of public perceptions of health risks associated with proximity to the plant. They said that if the plant is not cleaned up, property in the area will continue to lose its worth, and future development around the plant will suffer. One person spoke of difficulty in securing bank financing for development in the area because of the perceived risks.

Other negative economic effects that are of concern to many community members are those associated with permanent closure of the plant. Citizens recognize the economic contribution of the plant and its large workforce to the Denver area, and several interview participants expressed concern about large worker layoffs and the indirect effects on area businesses.

Public Information and Involvement Needs. Comments received by the Rocky Flats Plant indicate that, although communications between the plant and the public have improved within the last two years, more needs to be done to encourage and to provide opportunities for public participation in decisions concerning the plant, particularly concerning cleanup. Topics discussed during community interviews included the adequacy, timeliness and credibility of information provided about the plant; the availability of information in lay language; and the methods of gathering public ideas and suggestions for plant activities.

Many interview participants expressed discouragement in trying to obtain credible information about the plant, noting that information accessibility has improved recently. Others complained that the public lacks balanced information because of the various biases held by the agencies, organizations and individuals producing the information. Still others are frustrated by delays in receiving requested information due to agency approval processes.

Several interview participants requested that the plant produce more information in a manner that is understandable to nontechnical audiences. They said that much of the fear and distrust among segments of the public results from a lack of understanding of plant activities, problems and corrective actions.

Some interview participants offered suggestions regarding ways to encourage more meaningful dialogue with the public at public meetings and hearings. One participant offered ideas on how to set up meeting rooms in ways that are more conducive to public participation. Another recommended various meeting formats and presentation styles for improved communication.

Many of the interview participants said that open identification and discussion of all major issues, along with more opportunities for public involvement, would serve to improve the

plant's credibility and its relationship with the public. Participants also said that plant officials need to be proactive rather than reactive in its communications with the public about potentially controversial issues.

**Defense Policy Considerations.** Many questions exist in the community regarding the future of the Rocky Flats Plant. Discussions of moving plant operations elsewhere, coupled with the plant's recent proposal to build a new plutonium recovery building, have left both opponents and proponents of the plant wondering about its future.

The need for continued nuclear weapons production and maintenance is questioned and even refuted by some members of the community. Others view the plant as playing a necessary role in maintaining national security and favor relocation only when another facility is prepared to replace its function.

Much of the public does not delineate between national defense policy, which is determined by Congress and the President, and the U.S. Department of Energy policy designed to accomplish the mission defined by the above entities. Additionally, citizens generally lack information on how to participate in the policy making process and how decisions are made regarding the plant's production mission and budget requirements.

# D. Objectives

The activities outlined in the *Rocky Flats Plant Community Relations Plan* are designed to increase the public's level of understanding of the environmental restoration program and to enhance the community's role in decision making. The community concerns identified in the previous section provide the basis for many of the activities.

• Enhance Public Knowledge. The community interview process demonstrated that citizens in the area generally understand the Rocky Flats Plant's mission. However, a lack of nontechnical information about plant activities has raised public concern, particularly regarding environmental contamination and public and worker health and safety.

The plant will respond to the public's need for information, particularly concerning cleanup issues, by developing fact sheets and citizen guides on topics of interest to the public, issuing news releases and periodic updates on cleanup activities and providing plant tours. Also, the plant will offer a speakers bureau to area organizations and schools and will conduct an internal communications program for plant employees. Several information repositories will be maintained for public review of environmental restoration documents.

The plant will offer briefings on environmental restoration and related topics to businesses, interest groups, oversight committees and government officials and agencies, and one-on-one discussions with interested members of the community will be encouraged as an effective

means of responding to citizen questions and concerns. Additionally, a Community Relations Plan Information Coordinator at the plant will be available to respond to all citizen requests for environmental restoration information.

• Encourage Public Involvement. Comments received from members of the community indicate that they want more of a role in decisions about cleanup activities. Increased availability of technical and nontechnical information, coupled with frequent opportunities for public input, will provide for meaningful public involvement in environmental efforts at the plant. The plant will provide numerous public information and public comment meetings throughout the cleanup process as well as small workshops and availability sessions.

Responsiveness summaries, in which responses are provided for public comments on documents, will be prepared and made available by the plant after each public comment period. The responsiveness summaries will ensure the consideration of public comments and will describe their incorporation into the document under review.

- Provide a Forum for Resolution of Community Concerns. Cooperative efforts to address environmental remediation issues at the Rocky Flats Plant will provide a framework for the resolution of community concerns arising from differences in opinion and technical approach. By bringing the community into the cleanup process in the early stages of decision making, all groups involved will better understand the challenges and options that must be factored into a viable solution. The plant will establish a Technical Review Group, comprising representatives of federal and state regulators, local governments and interest groups, to offer input in the early stages of planning for cleanup.
- Meet RCRA, CERCLA and IAG Requirements. Through implementation of the Rocky Flats Plant Community Relations Plan, the plant will meet all community relations requirements of RCRA, CERCLA and the IAG. The plan will be revised, if necessary, to address any new community concerns expressed during environmental remedial design and construction activities. Also, the plan will be revised, if necessary, to meet changing needs of the community or to comply with the community relations requirements of new or amended regulations. Community interviews may be held, if appropriate, to identify changes in the information and involvement needs of the community.

# E. Community Relations Activities

Many of the community relations activities outlined in this section are based on requirements set forth in CERCLA,RCRA and the IAG. Additional activities reflect suggestions offered by the

public during the community interview process. All of these activities are designed to bring the community into the environmental restoration process through meaningful exchange of information and ideas.

#### Required Activities

The Rocky Flats Plant will implement the required community relations activities as follows:

- Information Repositories. Information repositories are established to ensure public access to environmental restoration documentation. Five information repositories currently are maintained at:
  - the U.S. Department of Energy Public Reading Room at Front Range Community College Library, Westminster;
  - the U.S. Environmental Protection Agency, Region VIII Superfund Records Center, Denver;
  - the Colorado Department of Health, Denver;
  - the Rocky Flats Environmental Monitoring Council, Golden; and
  - the Boulder Public Library, Boulder. [See note on page 18.]

Addresses, telephone numbers and hours of operation are provided in Appendix D.

The IAG identifies the types of documents that must be sent to the information repositories upon their release. Other materials may be made available to the public upon request. All of the information repositories contain the types of documents listed below as required. In addition, the U.S. Department of Energy Public Reading Room has a wealth of historical information about the plant.

The types of information repository documents required by the IAG are as follows:

- RCRA Facility Investigation/CERCLA Remedial Investigation Workplans (Draft and Final);
- RCRA Facility Investigation/CERCLA Remedial Investigation Reports (Draft, All Phases and Final):
- RCRA Corrective Measures Study/CERCLA Feasibility Study Reports (Draft, All Phases and Final);
- CERCLA Proposed Remedial Action Plan (Draft and Final);
- Interim Measures/Interim Remedial Action Plans and Decision Documents (Draft, Proposed and Final):
- Responsiveness Summaries;
- RCRA Corrective Action Decisions/CERCLA Records of Decisions (Draft and Final);
- RCRA Corrective/CERCLA Remedial Design Plans;
- RCRA Corrective Design/CERCLA Remedial Design Workplans;
- Community Relations Plans:
- Sampling and Analysis Plans;
- Plan for Prevention of Contaminant Dispersion;
- Background Study Plan;

- Treatability Study Plan;
- Workplan to Implement Discharge Limits for Radionuclides;
- Interim Measures/Interim Remedial Action Implementation Document; and
- Certification of Completion;
- Historical Release Report;
- Monthly Progress Reports:
- Health and Safety Plan;
- Baseline Risk Assessment Technical Memoranda;
- RCRA Corrective Measures Study/CERCLA Feasibility Study Technical Memoranda;
- RCRA Facility Investigation/CERCLA Remedial Investigation Workplan Technical Memoranda: and
- Priority Proposal for Operable Units No. 3,5,6,8,12,13,14,15 and 16.

In addition, the following documents and types of documents will be available for public review at the information repositories:

- -Comprehensive Environmental Response, Compensation and Liability Act/Superfund Amendments Reauthorization Act;
- -Resource Conservation and Recovery Act/Hazardous and Solid Waste Amendments;
- -Colorado Hazardous Waste Act:
- -National Oil and Hazardous Substances Pollution Contingency Plan;
- -Interagency Agreement;
- -Community Relations in Superfund: A Handbook;
- -Fact Sheets:
- -News Releases:
- -Environmental Restoration Update; and
- -Other Relevant Laws and Guidance Documents.

The information repository located at the Boulder Public Library was recently added in response to suggestions offered by community interview participants. The Rocky Flats Plant will continue to explore options for enhancing public access to information at the repositories, such as the establishment of additional repositories and implementation of a computerized system for remote access to information. The plant will evaluate the information respositories on an annual basis, assessing the level of public use, possible improvements to information access and their cost implications, if any, and the availability of funding for the repositories.

 Administrative Record. Copies of the administrative record, which is the information that supports the selection of a response action, will be available to the public for review throughout the environmental restoration process.

Copies of the administrative record are available on microfiche at the five information repositories listed above and in Appendix D. [NOTE FOR DRAFT CRP: The administrative record is not yet available but will be by the time the CRP is implemented.] Copies are available for public review after normal business hours at the U.S. Department of Energy Public Reading Room at the Front Range Community College Library and at the Boulder

Public Library. [See notes above.] An up-to-date index of the administrative record and a listing of its locations will be placed in any information repository established in the future.

The Rocky Flats Plant will update the administrative record at least quarterly. An index of documents in the complete administrative record will be included with each update.

• Mailing List. The Rocky Flats Plant will maintain a mailing list of individuals and organizations interested in receiving information about the plant and will share the list with the U.S. Environmental Protection Agency and the Colorado Department of Health. The list will be used for the dissemination of items such as notices of public meetings, news releases, fact sheets and the Environmental Restoration Update. Mailing list additions, changes and deletions will be made upon request to the Community Relations Plan Information Coordinator at the following address and telephone number:

Community Relations Plan Information Coordinator Community Relations Division EG&G Rocky Flats, Inc. P.O. Box 464, T130F Golden, Colorado 80401-0464 (303)966-6160

News Releases. The Rocky Flats Plant will periodically issue news releases about
environmental restoration activities to the news media and interested citizen groups.
Typical topics addressed in a news release could include the beginning of a public comment
period on an environmental restoration document, the selection of a remedial action for an
operable unit or the start-up or completion of a cleanup project.

The plant will maintain a list of interested groups to whom news releases pertaining to IAG activities will be sent via facsimile transceiver concurrently with dissemination to the news media. For any organizations that do not have the technology to receive facsimiles, the news releases will be sent through regular mail. Interested groups can be included on the news releases list by contacting the Community Relations Plan Information Coordinator.

Public Meetings. The Rocky Flats Plant, along with the U.S. Environmental Protection
Agency and the Colorado Department of Health, will hold public information meetings at least
quarterly. The public information meetings will be held to review the status of significant
current and planned permitting and cleanup activities performed under RCRA and CERCLA.
The public information meetings will provide opportunities for citizens to ask questions and
to offer comments and suggestions.

In addition to the regular public information meetings, other meetings concerning environmental restoration progress and compliance with the IAG will be scheduled as needed and as determined by the U.S. Department of Energy, the U.S. Environmental Protection Agency or the Colorado Department of Health.

At least one public meeting will be held during the public comment period for each Proposed Remedial Action Plan and Proposed Interim Remedial Action Plan and concomitant draft RCRA permit or RCRA permit modification. Meetings on Proposed Plans will be held by the Rocky Flats Plant. Meetings on draft RCRA permits will be held by the Colorado Department of Health.

A Corrective Action Decision/Record of Decision will document the selection of a remedial action. Any proposed amendments to the Corrective Action Decision/Record of Decision, which would be brought about by changes in the actual remedial action, will be available for public review and comment. The Rocky Flats Plant will provide an opportunity for a public meeting during the public comment period on a proposed amendment to the Corrective Action Decision/Record of Decision.

Following completion of each remedial design and before remedial action begins, the Rocky Flats Plant will provide a public briefing on the planned remedial action. The briefings will be provided for all Corrective Designs and Remedial Designs/Remedial Actions. For Interim Measures/Interim Remedial Actions, briefings will be held unless otherwise stipulated by the U.S. Environmental Protection Agency and the Colorado Department of Health.

For Class 2 or Class 3 modifications to a RCRA corrective action permit, the party requesting the modification, either the U.S. Department of Energy or the Colorado Department of Health, will hold a public comment period and meeting.

A display advertisement announcing each public meeting held by the Rocky Flats Plant will be placed in, at a minimum, a major daily newspaper in the Denver area. Also, a direct mail notice will be sent to each person and organization on the plant's mailing list. Finally, a news release about the meeting will be sent to major radio and television stations in the areas with significant interest.

The Rocky Flats Plant will determine the locations of public meetings in conjunction with the U.S. Environmental Protection Agency and the Colorado Department of Health. Based on citizen recommendations made during the community interview process, most public meetings will be held on weekday (Monday through Thursday) evenings in the communities near the plant, provided adequate facilities are available.

Public meetings may be held periodically in or near the cities of Denver, Boulder, Golden, Thornton and Northglenn to consider issues of general interest or of particular interest to those cities. Possible meeting locations are listed in Appendix D.

Each public meeting held for the purpose of taking public comment will be transcribed by a court reporter. Transcripts will be placed in the information repositories for public review as soon as they are available to the Rocky Flats Plant and will be made a part of the administrative record. Additional copies of transcripts will be available to interested individuals upon written request to the Community Relations Plan Information Coordinator.

In developing formats for public meetings, the plant will continually look for ways to improve information dissemination and interaction with the public while meeting the legal and procedural requirements of RCRA, CERCLA and the IAG.

- Public Comment Opportunities. In accordance with CERCLA, RCRA, CHWA and/or the IAG, the following documents will be made available for public comment and will be placed in the information repositories:
  - Community Relations Plan;
  - Draft Colorado Hazardous Waste Act/RCRA Permits for Treatment, Storage and Disposal Units:
  - Draft Hazardous and Solid Waste Amendment Act Permits for Corrective Action at Solid Waste Management Units;
  - Colorado Hazardous Waste Act/RCRA Permits with Proposed Class 2 or Class 3 Modifications;
  - RCRA Cíosure Plans:
  - Interim Measures and Interim Remedial Action Plans;
  - CERCLA Final Proposed Remedial Action Plans;
  - Plan for the Prevention of Contaminant Dispersion; and
  - Workplan Designed to Implement Discharge Limits for Radionuclides.

The Colorado Department of Health will conduct the public comment periods for RCRA Closure Plans and RCRA permits. Scheduled public comment periods for IAG documents are listed in Appendix E.

A display advertisement announcing the availability of the documents for comment and the public comment period will be placed by the Rocky Flats Plant in, at a minimum, a major daily newspaper in the Denver area. The display advertisement will include a brief description of the document.

Notices about document availability will be sent to each person and organization on the plant's mailing list. Also, news releases about document availability will be sent to major radio and television stations in the areas of significant interest. When possible, the announcement of a document's availability will be combined with the announcement of the public comment meeting for that document.

The National Oil and Hazardous Substances Pollution Contingency Plan, which codifies the provisions of CERCLA, requires a 30-day comment period for proposed remediation plans and provides for an extension of at least 30 days. In addition, the IAG requires a public comment period of at least 60 days for Proposed Interim Measures/Interim Remedial Action Plans. Hence, the Rocky Flats Plant will provide a comment period of 60 days for each of the documents listed. At least one public meeting will be held during each public comment period for citizens to offer oral comments.

For interested citizens who have questions about the document on which they plan to submit comments, a contact at the Rocky Flats Plant will be identified in the display ad announcing

the availability of the document and the public comment period. The plant may offer additional opportunities for the public to obtain information or to ask questions about the document through informational meetings, workshops, question and answer sessions at the beginning of the public comment meetings or availability sessions at which plant representatives will be available to talk informally with concerned citizens on a one-on-one basis.

- Responsiveness Summaries. A responsiveness summary, in which a response is provided for each comment from the public, will be prepared following each public comment opportunity. The responsiveness summaries for RCRA corrective actions and CERCLA remedial actions will be placed in the information repositories. This will occur at least 10 days prior to commencement of the respective actions and at least at the same time as issuance of the final decision document for each. All responsiveness summaries will become part of the administrative record and placed in the information repositories.
- Public Hearing Opportunities. The Colorado Department of Health is responsible for holding public hearings on draft RCRA permits. The Rocky Flats Plant will assist the Colorado Department of Health with public hearings upon request. Copies of hearing transcripts will be provided to members of the public upon written request to the Community Relations Plan Information Coordinator.
- CERCLA Proposed Plans. Under CERCLA and the IAG, Proposed Plans will be developed for interim remedial actions and final remedial actions at several operable units at the Rocky Flats Plant. The Proposed Plans, which will be written in fact sheet format, will summarize the remedial alternatives examined, offer a preferred alternative and discuss the data supporting the selection of the preferred alternative. The public will have the opportunity to comment on all Proposed Plans, and a responsiveness summary will be issued for each one.
- RCRA Corrective Action Decision/CERCLA Record of Decision and Interim Measures/Interim Remedial Action. A summary of the information supporting the selection of a remedial action, as detailed in the proposed remedial action plan, will be documented in a Corrective Action Decision/Record of Decision will be included, along with a public comment responsiveness summary, in the administrative record.

Upon agreement by the parties, the U.S. Environmental Protection Agency and/or the Colorado Department of Health and the U.S. Department of Energy will sign the Corrective Action Decision/Record of Decision, representing final action by the regulatory agencies. The Corrective Action Decision/Record of Decision will be issued by either the Colorado Department of Health or the U.S. Environmental Protection Agency, respectively.

After the Corrective Action Decision/Record of Decision is signed, the plant will place an advertisement announcing the availability of the document in a major daily newspaper in the Denver area. The notice will include the basis and purpose of the selected action. Each Corrective Action Decision/Record of Decision will be available for public review at the information repositories 10 days prior to the commencement of its respective remedial action.

If the selected remedial action differs significantly from the Proposed Plan, the plant will include in the newspaper notice a discussion of the change in the Corrective Action Decision/Record of Decision if it determines that the change is consistent with the alternatives and the information considered. If the Rocky Flats Plant concludes that the change in remedy could not have been anticipated based on available information, a revised Proposed Plan will be issued for additional public comment.

If the actual remedial action implemented differs significantly from the action supported in the Corrective Action Decision/Record of Decision, the Rocky Flats Plant will either publish an explanation of the significant differences in a major daily newspaper in the Denver area, or, if necessary, propose an amendment to the Corrective Action Decision/Record of Decision.

In the latter case, the plant will place an advertisement announcing the proposed amendment and a brief description in a major Denver area daily newspaper. The proposed amendment to the Corrective Action Decision/Record of Decision and the information supporting the decision will be made available for public comment. The requirements for notification, location, recordkeeping and response will be consistent with those described previously. When possible, the newspaper notice of the proposed amendment will be combined with information on opportunities for public comment.

If modification of the Corrective Action Decision/Record of Decision involves the modification of a RCRA corrective action permit, the agency requesting the modification, either the U.S. Department of Energy or the Colorado Department of Health, will hold a public comment period and meeting on the modification.

The Rocky Flats Plant will place a notice of availability of an amended Corrective Action Decision/Record of Decision in a major daily newspaper in the Denver area. At least 10 days prior to initiation of the remedial action affected by the amendment, the amended Corrective Action Decision/Record of Decision and the supporting information will be made available for public review at the information repositories and will be included in the administrative record.

• **Dispute Resolution.** The IAG sets forth a process for the resolution of disputes between the U.S. Department of Energy, the U.S. Environmental Protection Agency and/or the Colorado Department of Health. Disputes not resolved by the agencies' project coordinators will be forwarded to the Dispute Resolution Committee, comprising one representative from each of the agencies. Upon resolution of the dispute at the Dispute Resolution Committee

level, nonlead agencies that disagree with the resolution may take the dispute to the Senior Executive Committee level. Senior managers from each of the three agencies serve on the Senior Executive Committee.

When disputes involving the U.S. Department of Energy are elevated to the Senior Executive Committee level, the Rocky Flats Plant will prepare a description of the issue of dispute, the dispute resolution process and the anticipated schedule. The plant will publish the description in the Environmental Restoration Update, which will report cleanup progress approximately every two months and will be mailed to each organization and individual on the Rocky Flats Plant mailing list. When appropriate, a news release on the issue will also be developed and disseminated.

Upon resolution of the dispute, the Rocky Flats Plant will provide the public with a description of how the issues were resolved and information on where final documentation is available for public review. The notification of dispute resolution will appear in the Environmental Restoration Update and will be issued as a news release, as appropriate.

• Technical Assistance Grants. The Technical Assistance Grant program, provided for in CERCLA, is a mechanism for citizen groups to obtain expert assistance in reviewing technical information on environmental restoration. The U.S. Environmental Protection Agency administers the program, providing one grant for each cleanup site. The cleanup site, in this case, is defined as the entire Rocky Flats Plant.

Through the grant program, citizen groups are reimbursed by the federal government for their efforts in the document review process, which allows for greater public participation than might be possible otherwise. The Technical Assistance Grant for activities related to the Rocky Flats Plant was awarded to the Rocky Flats Cleanup Commission. The Rocky Flats Plant welcomes the involvement of the Technical Assistance Grant recipient and will respond to all requests for information and documents.

• Response to Community Information Requests. The Rocky Flats Plant will respond to requests for information from all interested individuals and organizations. The public can request information in writing or by telephone by contacting the Community Relations Plan Information Coordinator.

Requests for information will be responded to in writing as soon as practicable and no later than 30 days from the date of the request. If requested information is not available, the response will supply the status of that information, including, if possible, an expected date of availability.

Fact Sheets on Interim and Final Proposed Plans and Corrective
 Design/Remedial Design. The Rocky Flats Plant will develop fact sheets for the public on Proposed Interim Measures/Interim Remedial Action Plans, summarizing remediation

alternatives and the proposed preferred action. The Proposed Plan for final remedial activity will be prepared in the form of a fact sheet and will be the subject of formal public comment.

A fact sheet on each Corrective Design/Remedial Design will be prepared near completion of remedial design but before initiation of remedial action. For all Interim Measures/Interim Remedial Action Plans, a fact sheet on Corrective Design/Remedial Design will also be produced when the design is near completion unless otherwise specified by the U.S. Environmental Protection Agency and the Colorado Department of Health.

Fact sheets will be provided to the public by dissemination at public meetings, including meetings of the Rocky Flats Environmental Monitoring Council. Additionally, multiple copies of fact sheets will be sent to municipalities surrounding the Rocky Flats Plant for their distribution to community leaders, staff and other interested parties. Fact sheets may also be mailed directly to organizations and individuals on the Rocky Flats Plant mailing list.

- Monthly Progress Reports and Oversight Reports. Monthly Progress Reports,
  describing environmental restoration activities initiated, continued or completed each
  month, will be available for public review at the information repositories. Oversight
  reports generated by the U.S. Environmental Protection Agency and the Colorado Department
  of Health also will be available at the information repositories upon receipt by the Rocky
  Flats Plant.
- Informational Meeting on Proposed Remedial Action. Prior to implementation of planned remedial actions, a public briefing will be provided to explain the elements of the remedial action. Public briefings will also be held prior to implementation of Interim Measures/Interim Remedial Actions unless otherwise specified by the U.S. Environmental Protection Agency and the Colorado Department of Health.
- Amendment of the IAG. The U.S. Department of Energy, the U.S. Environmental
  Protection Agency and the Colorado Department of Health will develop and agree to any major
  modifications to the IAG. Modifications that result in a corresponding change to the state
  Hazardous and Solid Waste Amendments Act will be offered for public comment. If
  modifications result in changes to the IAG schedule, the Rocky Flats Plant will notify the
  public through the plant's Environmental Restoration Update and through issuance of a news
  release.
- Revision of the Community Relations Plan. Prior to commencement of a RCRA
  Corrective Measures Implementation or CERCLA Remedial Design/Remedial Action, the
  Rocky Flats Plant Community Relations Plan will be revised, if necessary, to
  address any new community concerns expressed regarding remedial design and construction.
  Also, the Rocky Flats Plant Community Relations Plan will be reviewed at least

every two years and updated as necessary to meet changing needs of the community or if new or amended existing regulations require additional community relations activities. Future revisions will be made with addenda.

#### Additional Activities

The following additional community relations activities will be implemented by the Rocky Flats Plant:

- Briefings, Workshops, Presentations and Discussions. The Rocky Flats Plant will offer briefings, workshops and presentations on environmental restoration and related plans and activities to federal, state and local officials; local government technical staffs; business organizations; news media; schools; interest groups; and individuals as requested to the extent practicable. Presentations and discussions involving small groups and interested individuals will be encouraged.
- Technical Review Group. The Rocky Flats Plant will actively solicit public input in the early stages of planning for cleanup through the formation of a Technical Review Group. Participants will include representatives of the U.S. Environmental Protection Agency, the Colorado Department of Health, area local governments and interest groups.
- Public Tours. Tours of areas of the Rocky Flats Plant will be offered to groups and
  organizations at their request. If there is sufficient interest, tours for the general public
  and family members of employees will be conducted the second Monday of each month.
  All plant tours will comply with U.S. Department of Energy and EG&G Rocky Flats, Inc. tour
  policies. Plant tours for news media representatives will be held independent of public
  tours.
- Fact Sheets and Citizen Guides. Fact sheets and citizen guides, in addition to those
  required by federal statute as described above, will be developed to inform the public of
  major environmental restoration activities and other related issues. The fact sheets will
  describe efforts such as environmental sampling and analysis, environmental monitoring
  and risk assessment.
- Environmental Restoration Updates. The Rocky Flats Plant will publish an
  Environmental Restoration Update approximately every two months to describe progress in
  environmental restoration efforts. Concise summaries of other major environmental
  activities and a schedule of upcoming public involvement opportunities will be included. The
  Environmental Restoration Update will be distributed to individuals and organizations on the
  Rocky Flats Plant mailing list.

- Speakers Bureau. A speakers bureau will provide presentations by plant experts to community groups, businesses and others upon request. Speakers will offer a variety of topics, including environmental management, waste minimization, environmental monitoring and protection, remediation and environmental regulation.
- Employee Communications. The community relations efforts developed to inform and involve the public will be offered to Rocky Flats Plant employees as they are equally interested in the plant's environmental restoration program.

The community relations activities described will be implemented throughout the duration of the cleanup effort. Other activities may be added during that time based on requirements, community needs and available resources.

#### APPENDIX A

#### LIST OF CONTACTS AND INTERESTED PARTIES

The following list identifies community relations and technical personnel from the Rocky Flats Plant, the U.S. Department of Energy headquarters, the U.S. Environmental Protection Agency and the Colorado Department of Health who can be contacted with questions about environmental activities at the plant. The list also includes community interview participants who agreed to serve as contacts for citizens who may want to learn about various community perspectives on the plant. These individuals are identified with an asterisk (\*).

#### Rocky Flats Plant

#### Community Relations

Beth Brainard
Public Affairs Officer
U.S. Department of Energy
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Joe Tempel\* (303) 298-8001
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#### Area Residents

[Note: Seven area residents were interviewed in the community interview process. The following residents agreed to have their names listed as contacts.]

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[Note: Former executive director, Laura Lefkowits, was interviewed.]

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Bill Scanlon* Rocky Mountain News 400 West Colfax Avenue Denver, Colorado 80204 [Note: Former RMN reporter, Janet Day, was interviewed.]	(303)	892-5346
Greg Todd* Boulder Daily Camera 1045 Pearl Street Boulder, Colorado 80306 {Note: Former BDC reporter, Bill Scanlon, was interviewed.]	(303)	442-1202
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#### APPENDIX B

#### IAG LIST OF ROCKY FLATS PLANT HAZARDOUS SUBSTANCES

As identified in the IAG, the following materials are hazardous substances used at the plant that have been released or that could be released to the environment.

#### Radionuclides

Plutonium 239,240 Americium 241 Uranium 233,234,235 and 238 Tritium Gross Alpha Gross Beta

#### Metals

Aluminum
Beryllium
Calcium
Cadmium
Cobalt
Chromium
Barium
Lead
Magnesium
Selenium
Sodium
Silver
Strontium
Thallium

Zinc Mercury Nickel Lithium

#### Inorganics

Sulfuric Acid
Nitric Acid
Hydrofluoric Acid
Sodium Hydroxide
Hydrochloric Acid
Nitrate
Sulfate
Hydroxide

#### Volatile Organics

1,1,2-Trichloroethylene
Chloroform
1,1,1-Trichloroethane
Carbon Tetrachloride
1,2-Dichloroethane
Acetone
Perchloroethane
Benzene
Toluene
Methylethyl Ketone Peroxide
Dichloromethane
Xylene
2-Butanone
Methylene Chloride
Methyl Ethyl Ketone

#### Semi-Volatile Organics

Bis(2-ethylhexyl)phthalate Ethylene Glycol

#### Miscellaneous

Diesel Fuel
Fuel Oil
Peroxide
Asbestos
Oil Sludge
Polyester Resin
Still Bottom Sands

### **ROCKY FLATS COMMUNITY INTERVIEW PLAN**

Prepared for U.S. Department of Energy under Contract No. DE-AC04-90DP62349

March 1990

#### ROCKY FLATS COMMUNITY INTERVIEW PLAN

#### Phase I

#### I. Community Interview Plan

This Plan outlines objectives and procedures for the community interviewing process for the Rocky Flats Community Relations Plan (CRP), which is being developed for environmental restoration activities of the Plant. The effectiveness of this CRP, required under the provisions of CERCLA (Superfund), depends heavily on the community interviewing process. These interviews determine the community's level of interest and concerns in the environmental restoration process of the Plant. It is imperative to ascertain what the community's concerns are and the public's desired degree of involvement.

Involvement by the public through the interviewing process represents the first and very important contact with each community and assists in establishing trust, respect, effective two-way communication and a good working relationship among that public and the appropriate agencies to achieve an informative Community Relations Plan.

Environmental Protection Agency (EPA) Region VIII and Colorado Department of Health (CDH) community involvement staff will oversee development and implementation of the Community Relations Plan.

#### II. Objectives of the Community Interviews

- To meet CERCLA requirements, certain provisions of RCRA and the proposed Interagency Agreement (IAG).
- To identify community concerns so the Rocky Flats Community Relations Plan can be developed to address those concerns.
- To develop the most beneficial community relations techniques for the Community Relations Plan.
- To ascertain the desired degree of community involvement.
- To determine the frequency of needed communications with the public at what level and in what type of forum.
- To define the community geographical boundaries.
- To determine whether the scope of the Community Relations Plan should include environmental or waste management actions in addition to those associated with the cleanup.

#### III. Community Interview Program

The Community Interview Program will be conducted in two phases. Phase I of the interview program will involve the initial interviews as listed in Attachment I. Phase II will involve additional interviews with individuals and/or groups identified through the Phase I process.

The Phase I interviews will begin in April of 1990 and conclude in June of 1990. The Phase II process will be initiated at the conclusion of the Phase I interviews. The conclusion of Phase II will be dependent on the number of interviews identified to be conducted.

#### IV. Interview Format

Community interviews will be conducted by several teams of 2-3 persons representing Rocky Flats Plant personnel, including the Department of Energy (DOE), EG&G Community Relations Department staff, EG&G Environmental Restoration personnel, and EG&G Management. EPA and CDH community involvement staff will accompany Rocky Flats personnel on some interviews. Rocky Flats will provide EPA and CDH with interview schedules at least every two weeks.

These interviews will be conducted on a face-to-face, informal basis. Interviews will be arranged through telephone contacts to be held at times and locations convenient to those being interviewed.

Prior to the actual interviewing, each team will provide the interviewee with a short, informal briefing on the Community Relations Plan, environmental restoration at the Rocky Flats Plant and the purpose of the interview. For the interview questions, please reference Attachment 2 of this plan.

Interviews will be conducted in such a way as to assure confidentiality to those interviewed to the extent that the information can be legally protected. Interviewers will explain that the information is being gathered to help in development of a meaningful CRP, but that attribution to specific statements in the plan will not be made. However, those interviewed will be provided the opportunity to have their names, addresses and telephone numbers placed on the contact list, which is appended to the CRP.

#### V. Information Derived from the Interview Program

A data sheet for each interview will be kept, recorded, and the data will be tabulated to determine community concerns and ideas for inclusion in the Rocky Flats Community Relations Plan. These data interviewing sheets will contain the name, address and telephone number of those interviewed at the top of the sheet and will list interview questions with adequate space after each question for the interviewers to record each response. Persons interviewed will be provided a copy of the data sheet compiled for their own interview if requested.

With the completion of the community interviewing process the data will be tabulated to determine the main concerns of the community; the most effective community relations techniques for the development of the Community Relations Plan; methods to continue to involve the community; convenient locations for public meetings and information repositories and convenient times to the public for these meetings to be held and the repositories to be open.

#### Attachment 1

## Phase I Community Interviews For Rocky Flats Community Relations Plan

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#### Congresswoman Pat Schroeder

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#### 

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Contact: Jack Van Ens, Executive Director

#### Peter B. Teets, President

Martin Marietta Astronautics Group Denver Division 12275 S. Hwy. 121 P. O. Box 179 Denver, CO 80201 (303) 977-3000

#### Norm Waugh, Realtor

Metro Brokers Arvada North 7828 Vance Drive Arvada, CO 80004 (303) 423-6000

#### Western Grain Resources

11728 Highway 93 Boulder, CO 80303 (303) 499-1032

Contact: Maureen McCarthy

#### Great Western Inorganics, Inc.

17400 Highway 72 Golden, CO 80403 (303) 423-9770 Contact: Roger Vernon

#### Citizen Groups

#### Sierra Club

Rocky Mountain Chapter
Enos Mills Group
777 Grant
Denver, CO 80203
(303) 861-8819
Contact: Eugene DeMayo (303) 642-3117(H) (303) 595-3703(W)

#### **Greenpeace Action**

2025 16th St. Boulder, CO 80302 (303) 440-3381 Contact: Jason Salzman

#### **Environmental Defense Fund**

1405 Arapahoe Boulder, CO 80302 (303) 440-4901 Centact: Melinda Kassen

#### American Friends Service Committee, Inc.

North Central Region
Rocky Flats Nuclear Disarmament Project
1535 High, 3rd Floor
Denver, CO 80218
(303) 322-6355
Contact: Tom Rauch, Director

#### Communities United for Environmental Safety

9763 Independence Street Westminster, CO (303) 422-1741 (H) (303) 220-2919 (W) Contact: Glenna Smith

#### Rocky Flats Cleanup Commission

1738 Wynkoop Suite 302 Denver, CO 80202 (303) 298-8001

Contact: Joe Tempel, President

#### Native American Rights Fund

1506 Broadway Boulder, CO 80302 (303) 447-8760

Contact: Mr. John Echohawk, Executive Director

#### Neighbors Concerned About Rocky Flats

280 Flint Way
Broomfield, CO 80020
(303) 466-3666
Contact: Gretchen Williams

#### Committee Against Radiotoxic Pollution

10161 Wolff Street
Westminster, CO 80030
(303) 466-1212
Contact: Kim Grice, Chairman

#### Concerned Health Technicians for a Cleaner Colorado

6183 Holland Street Arvada, CO 80004 (303) 420-2967

Contact: Paula Elofson - Gardine, Director

#### Citizens Against Rocky Flats Contamination

7700 W. 61st Ave., Suite 12

Arvada, CO 80004

(303) 421-3383

Contact: Greg Marsh

#### Colorado Peace Council

8625 Clay Street, #226

Westminster, CO 80030

(303) 331-8326

Contact: Cathy Schuster

#### Colorado Freeze Voter

1520 Euclid Avenue

Boulder, CO 80302

(303) 443-3680

Contact: Steve Perry

#### Rocky Mountain Peace Center

P.O. Box 1156

Boulder, CO 80306

(303) 447-9321

Contact: Carolyn Bninski, Leroy Moore, David Wilson, Paul Casey

#### Jan Pilcher

**Rocky Flats Activist** 

3981 S. Birch Street

Englewood, CO 80110

(303) 756-6304

#### Colorado Atomic/Agent Orange Veterans

7363 W. 26th Place

Denver, CO 80215

(303) 238-2148

Contact: Dr. William Kemper

#### Networking Colorado

6183 Holland Street

Arvada, CO 80004

(303) 556-4589

Contact: Susan Hurst

#### National Toxics Campaign

3570 E. 12th Ave.

Denver, Co 80206

(303) 333-9714

Contact: Adrienne Anderson

#### Education

Dr. Robert R. Meglen, Director
University of Colorado
Center for Environmental Sciences
Campus Box 136, 1200 Larimer Street
Denver, CO 80204
(303) 556-3297

James Mortensen, Acting Superintendent Jefferson County School District 1829 Denver West Drive, Building 27 Golden, CO 80409 (303)273-6800

Heather Clifton, Principal
Sheridan Green Elementary School
10951 Harlan Street
Broomfield, CO 80020
(303) 466-1931

Cary Isreal, President
Front Range Community College
3645 West 112th Ave.
Westminster, CO 80030
(303) 466-8811

#### Medical Professionals

Physicians for Social Responsibility 1738 Wynkoop, Suite 302 Denver, CO 80202 (303) 298-8001 Contact: Laura Leftkowitz/Ken Lichtenstein

Dr. Robert W. Bistline EG&G Medical, Bldg. 122 P.O. Box 464 Golden, CO 80402 (303) 966-4309

#### **Adiacent Residents**

Five residents adjacent to the plant boundry will be interviewed. The names and addresses of these private citizens are not published in order to protect their privacy as per U.S. Environmental Protection Agency guidance (EPA/540/G-88/002, OSWER Directive 9230.0-3B, Community Relations in Superfund - A Handbook, June 1988).

#### Attachment 2

- 1. What do you know about the Rocky Flats Plant?
- 2. What are your main concerns regarding the Rocky Flats Plant? Why are you concerned?
- 3. Do you need more information about the Plant? If so, what type of information do you need?
- 4. What agencies or groups do you believe to be credible sources of information on Rocky Flats? How might credibility be improved?
- 5. Have you found it difficult to obtain information about Rocky Flats? Please explain.
- 6. How can we best provide you with information about environmental cleanup activities and related issues (i.e. fact sheets, newsletters, mailing lists, briefings, newspaper articles, computer access to information, public meetings)? How often would you like to have information on cleanup activities?
- 7. What would you consider to be the best location, time and day, for public meetings?
- 8. The law requires that an information repository be established. Where would be the most convenient locations?
- 9. How can we best involve you and encourage participation in cleanup activities at Rocky Flats (i.e. review of documents, public comment opportunities, participation in upfront planning, workshops)?
- 10. Would a community work group, meeting on a regular basis to review and make recommendations for cleanup plans, be a useful means for community involvement? If so, who should be part of the community working group?
- 11. Under CERCLA, Community Relations Plans are developed to inform and involve the community in environmental cleanup. Do you think the scope of the Plan should include other environmental or waste management issues?
- 12. In your opinion, what geographical area should be included in the community definition for this Plan?
- 13. What other individuals or groups do you think we should interview for development of this Community Relations Plan?
- 14. Would you like to be listed on the contact list of the Community Relations Plan?
- 15. What are your expectations regarding cleanup of the Rocky Flats Plant?

#### APPENDIX D

#### INFORMATION REPOSITORIES AND SUGGESTED LOCATIONS FOR PUBLIC MEETINGS

#### A. Information Repositories

U.S. Department of Energy Rocky Flats Public Reading Room Front Range Community College Library 3645 West 112th Avenue Westminster, Colorado 80030

(303)469-4435

Hours:

12:00 P.M. - 8:00 P.M.

Monday and Tuesday

10:00 A.M. - 4:00 P.M.

Wednesday

9:00 A.M. - 4:00 P.M.

Thursday and Friday

Boulder Public Library 1000 Canyon Boulevard Boulder, Colorado 80302 (303)441-3100

Hours: 9:00 A.M. - 9:00 P.M.

Monday - Thursday

9:00 A.M. - 6:00 P.M.

Friday and Saturday

12:00 P.M. - 6:00 P.M. Sunday

U.S. Environmental Protection Agency

(303) 293-1807

Region VIII

Superfund Records Center 999 18th Street, Suite 500 Denver, Colorado 80202-2405

Hours: 7:30 A.M. - 4:30 P.M.

Monday - Friday

Colorado Department of Health

4210 East 11th Avenue, Room 351

Denver, Colorado 80220

Hours: 8:00 A.M. - 5:00 P.M.

Monday - Friday

(303) 331-4830

	Rocky Flats Environmental Monitoring Council Building 4, Denver West Office Park 1536 Cole Boulevard, Suite 150 Golden, Colorado 80401	(303)	232-1966
	Hours: By Appointment		
В.	Suggested Locations for Public Meetings		
	Arvada City Hall City Council Chambers 8101 Raiston Road Arvada, Colorado 80002 Capacity: Approximately 150	(303)	421-2550
	Clarion Harvest House Hotel 1345 28th Street Boulder, Colorado 80302 Capacity: Up to 444	(303)	443-3850
	Denver Marriott West 1717 Denver West Marriott Boulevard Golden, Colorado 80401 Capacity: Up to 600	(303)	279-9100
	Thornton City Hall City Council Chambers 9500 Civic Center Thornton, Colorado 80229 Capacity: Up to 274	(303)	538-7248
	Westminster City Park Recreation Center 10455 Sheridan Boulevard Westminster, Colorado 80030	(303)	460-9690

Capacity: Up to 250

## APPENDIX E

# PUBLIC COMMENT OPPORTUNITIES

Document	Comment Period
OU 2 Proposed Surface Water Interim Measures/Interim Remedial Action Plan	September-November 1990
Community Relations Plan	January-March 1991
Plan for Prevention of Contaminant Dispersion	March-April 1991
Treatability Study-Environmental Assessment	June-July 1991
Workplan Designed to Implement Discharge Limits for Radionuclides	August-October 1991
OU 15 Closure Plan	December 1991-February 199
Treatability Study Report	October 1993-January 1994
Proposed OU 1 Final Remedial Action Plan/Environmental Assessment	January-March 1994
Proposed OU 2 Final Remedial Action Plan/Environmental Assessment	August-October 1994
Proposed OU 4 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	September-November 1994
Proposed OU 6 Remedial Action Plan/Environmental Assessment	January-March 1995
Proposed OU 7 Environmental Assessment/Interim Measures/Interim. Remedial Action Plan	April-June 1995
Proposed OU 5 Final Remedial Action Plan/Environmental Assessment	May-July 1995
Proposed OU 8 Final Remedial Action Plan/Environmental Assessment	July-September 1995
Proposed OU 12 Remedial Action Plan/Environmental Assessment	September-November 1995

1992\*

Proposed OU 9 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	October-December 1995
Proposed OU 10 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	November 1995-January 1996
Proposed OU 13 Remedial Action Plan/Environmental Assessment	January-March 1996
Proposed OU 11 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	March-May 1996
Proposed OU 14 Remedial Action Plan/Environmental Assessment	May-July 1996
Proposed OU 4 Remedial Action Plan	September-November 1997
Proposed OU 7 Remedial Action Plan/Environmental Assessment	February-April 1998
Proposed OU 9 Final Remedial Action Plan/Environmental Assessment	December 1998-January 1999
Proposed OU 11 Final Remedial Action Plan/Environmental Assessment	January-March 1999
Proposed OU 10 Final Remedial Action Plan/Environmental Assessment	April-June 1999

<sup>\*</sup> The Colorado Department of Health is responsible for holding public comment periods on RCRA Closure Plans.

#### APPENDIX F

#### LIST OF ACRONYMS AND GLOSSARY OF TERMS

#### A. Acronyms

AEC Atomic Energy Commission

AIP Agreement in Principle

CAD Corrective Action Decision

CDH Colorado Department of Health

Corrective Design

CERCLA Comprehensive Response, Compensation and Liability Act of 1980

CHWA Colorado Hazardous Waste Act

CMI Corrective Measures Implementation

CMS Corrective Measures Study
CRP Community Relations Plan
DOE U.S. Department of Energy

DOE-RFO U.S. Department of Energy - Rocky Flats Office

EPA U.S. Environmental Protection Agency

ER Environmental Restoration

ERDA Energy Research and Development Administration

FS Feasibility Study

FFACO Federal Facility Agreement and Consent Order

HSWA Hazardous and Solid Waste Amendments

Interagency Agreement

IM/IRA Interim Measures/Interim Remedial Action

LLW Low-Level Radioactive Waste

NCP National Oil and Hazardous Substances Pollution Contingency Plan

NEPA National Environmental Policy Act

Q Operable Unit

PA/SI Preliminary Assessment/Site Investigation RCRA Resource Conservation and Recovery Act

RD/RA Remedial Design/Remedial Action

RFA RCRA Facility Assessment
RFI RCRA Facility Investigation

RFP Rocky Flats Plant
RI Remedial Investigation
RCD Record of Decision

SARA Superfund Amendments and Reauthorization Act

SWMU Solid Waste Management Unit

TRU Transuranic

VCC Volatile Organic Compound

#### B. Glossary of Terms

#### Administrative Record

The information that supports the selection of an environmental restoration response action.

#### Agreement in Principle

An agreement entered into in June 1989 between the U.S. Department of Energy and the Colorado Department of Health concerning environmental management, monitoring and restoration activities at the Rocky Flats Plant. The agreement also commits the U.S. Department of Energy to providing additional funding to the state for implementation of state oversight activities.

#### Colorado Hazardous Waste Act

A state law that grants the state of Colorado the authority to enforce the Resource Conservation and Recovery Act within the state.

## Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA)

A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The acts create a tax that is collected in a trust fund, commonly known as Superfund, to support the investigation and remediation of abandoned or uncontrolled hazardous waste sites.

#### Community Relations Plan (CRP)

A document that assesses and defines a community's concerns and informational needs with regard to potential hazards posed by conditions at hazardous waste sites. The Community Relations Plan also encourages and provides mechanisms for communication and cooperative efforts between the affected community and the public agency overseeing the site cleanup.

#### Contaminants

Materials that pose a threat to public health and/or the environment. Typically, contaminants and hazardous substances are materials that are toxic, corrosive, ignitable, explosive or chemically reactive.

#### Corrective Measures Implementation (CMI)

The step in the RCRA process in which a corrective action system is designed and implemented. The CMI is comperable to the Remedial Design/Remedial Action phase of the CERCLA process.

#### Corrective Measures Study (CMS)

The step in the RCRA process in which alternatives for a corrective action system are investigated and screened. The CMS is comperable to the feasibility study phase of the CERCLA process.

#### Feasibility Study (FS)

The step in the CERCLA process in which alternatives for a remedial action system are investigated and screened.

#### Federal Facility Agreement and Consent Order

Agreement among the U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health that sets forth a workscope and schedule for environmental restoration at the Rocky Flats Plant. The agreement is commonly known as the Interagency Agreement, or the IAG.

#### Hazardous and Solid Waste Amendments

A federal law enacted in 1984 that amends the Resource Conservation and Recovery Act.

#### Interagency Agreement (IAG)

See Federal Facility Agreement and Consent Order.

#### National Oil and Hazardous Substances Pollution Contingency Plan

The federal regulation that guides the Superfund program.

#### National Priorities List (NPL)

EPA's list of top priority hazardous waste sites that are eligible for investigation and cleanup under the federal Superfund program.

#### Operable Unit

A designated area, comprising individual hazardous substance sites, that has been identified for evaluation and cleanup.

#### Preliminary Assessment/Site Inspection (PA/SI)

The CERCLA initial process for collecting and reviewing information about a known or suspected hazardous waste site or release to determine if a site needs further study or if a response action is required.

#### RCRA Facility Assessment (RFA)

The initial RCRA process that determines whether corrective action for a RCRA past practice unit is warranted or that defines the additional data necessary to make this determination. The RFA is analogous to a CERCLA Preliminary Assessment and Site Investigation (PA/SI).

#### RCRA Facility Investigation (RFI)

The RCRA process that determines the extent of hazardous waste contamination. The RFI is analogous to the CERCLA Remedial Investigation.

#### Record of Decision (ROD)

The CERCLA document that selects the method of remedial action to be implemented at a site after the Feasibility Study/Proposed Plan process has been completed. The Record of Decision is published in the Federal Register. The ROD is comperable to the RCRA Corrective Action Decision.

#### Remedial Action (RA)

The CERCLA process of remedial action implementation after the investigative steps have been completed, after issuance of the Record of Decision and after completion of the Remedial Design.

#### Remedial Design (RD)

The CERCLA process of design for the remedial action alternative that was selected in the Record of Decision.

#### Remedial Investigation (RI)

The CERCLA process that determines the extent of hazardous substance contamination and includes, as appropriate, treatability investigations. The Remedial Investigation is conducted in conjunction with the Feasibility Study.

#### Resource Conservation and Recovery Act (RCRA)

A federal law enacted in 1981 that regulates the generation, transportation, treatment, storage and disposal of hazardous waste.

#### Responsiveness Summary

A summary of oral and/or written public comments received during a public comment period on documents and agency responses to those comments. The responsiveness summary is especially valuable during the decision process at a site because it highlights community concerns about the proposed decision.

#### Solid Waste Management Unit (SWMU)

A distinct area where solid waste, including hazardous waste, has or may have been placed, either planned or unplanned.

#### Superfund

The common name used for the program created by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 as amended in 1986. The U.S. Environmental Protection Agency administers the uncontrolled hazardous waste site cleanup program.

#### Superfund Amendments and Reauthorization Act

The reauthorization of the CERCLA statute enacted by Congress in 1986.

#### Transuranic Waste

Waste contaminated with long-lived transuranic elements in concentrations within a specified range established by the U.S. Department of Energy, the U.S. Environmental Protection Agency and the U.S. Nuclear Regulatory Commission. These elements appear beyond uranium on the periodic table of the elements, hence the name "transuranic."

#### APPENDIX G

#### REFERENCES

- Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), P.L. 96-510.
- Denver Regional Council of Governments, 1989 Population and Household Estimates, September 1989.
- EG&G Rocky Flats, Inc., Rocky Flats Plant Site Environmental Report for 1989, RFP-ENV-89.
- Hazardous and Solid Waste Amendments of 1984 (HSWA), P.L. 98-616.
- Lamm-Wirth Task Force, Final Report of Lamm-Wirth Task Force on Rocky Flats,
  October 1975.
- National Environmental Policy Act (NEPA), P.L. 91-190.
- Environmental Protection Agency, *National Oil and Hazardous Substances Pollution Contingency Plan*, 40 CFR Part 300 (FRL-3644-1), RIN 2050-AA75, Final Rule, February 1990.
- Resource Conservation and Recovery Act of 1976 (RCRA), P.L. 94-580.
- Special Assignment Team, Assessment of Environmental Conditions at the Rocky Flats Plant, Golden, Colorado, August 1989.
- Superfund Amendments and Reauthorization Act of 1986 (SARA), P.L. 99-499.
- U.S. Department of Energy, Comprehensive Environmental Assessment and Response Program, Phase 1: Installation Assessment, Rocky Flats Plant, Albuquerque Operations Office, April 1986.
- U.S. Department of Energy, Corrective Action Plan in Response to the August 1989

  Assessment of Environmental Conditions at the Rocky Flats Plant, July 20, 1990.
- U.S. Department of Energy, Final Environmental Impact Statement: Rocky Flats Plant Site, Golden, Jefferson County, Colorado, Washington, D.C., DOE/EIS-0064, April 1980.
- U.S. Department of Energy, Long-Range Rocky Flats Utilization Study, ALO-1983, February 1983.
- U.S. Environmental Protection Agency, Community Relations in Superfund: A Handbook,